



September 13, 2006


The Honorable Vernon A. Williams  
Secretary  
Surface Transportation Board  
1925 K. St. N.W.  
Washington, D.C. 20423

RE: Ex Parte 646 (Sub-No. 1), *Simplified Standards for Rail Rate Cases*

Dear Mr. Williams:

The Alliance for Rail Competition supports the Motion for Extension of Time filed in this proceeding on September 8, 2006 by the American Chemistry Council, the Fertilizer Institute, the National Grain and Feed Association, and The National Industrial Transportation League. It is anticipated that ARC will be filing a unified statement with the shipper parties in this proceeding and an extension of time will provide the necessary time to put together a unified statement.

Sincerely,



Terry Whiteside, Chairman  
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